

REMARKS

Summary of Office Action

Claims 1-65 were pending in the above-identified patent application.

The drawings were objected to under 37 C.F.R. § 1.84(p)(5) because reference numerals "1102" (FIG. 12B) and "1104" (FIG. 12C) were not mentioned in the specification and because the drawings do not include reference numeral "802" mentioned in page 25, line 31, of the specification.

Claims 1-3 and 30-32 were rejected under 35 U.S.C. § 102(e) as being anticipated by Bereiter et al. U.S. Patent No. 5,917,492 (hereinafter "Bereiter"). Claims 1 and 30 were rejected under 35 U.S.C. § 102(e) as being anticipated by Alexander et al. U.S. Patent No. 6,177,931 (hereinafter "Alexander"). Claims 1, 4-8, 10-13, 16-30, 33-37, 39-44, 47-51, and 53-65 were rejected under 35 U.S.C. § 102(b) as being anticipated by Matthews, III U.S. Patent No. 5,815,145 (hereinafter "Matthews"). Claims 9, 14, 15, 38, 45, 46, 58, 59, 64, and 65 were rejected under 35 U.S.C. § 102(a) as being anticipated by Agasse PCT No. WO 00/05887.

Claims 2, 3, 31, and 32 were rejected under 35 U.S.C. §103(a) as being unpatentable over Alexander. Claim 52 was rejected under 35 U.S.C §103(a) as being unpatentable over Knudson et al., PCT No. WO 99/56466, in view of Matthews.

Summary of Applicants' Reply to Office Action

In response to the drawing objections in the Office Action, applicants have amended the specification to correct inconsistencies between the drawings and the specification.

Independent claims 1, 12, 26, 30, 43, and 60 have been amended to more particularly point out and distinctly claim the invention. No new matter has been added, and the amendments to independent claims 1, 12, 26, 30, 43, and 60 are fully supported and justified by the application as originally filed. Support for independent claims 1, 12, 26, 30, 43, and 60 can be found in the originally filed application in, for example, FIGS. 7A to 9B, and in the corresponding detailed description on page 24, line 7 to page 29, line 10. Dependent claims 2-3, 5, 7, 12, 14, 21-22, 26-28, 31-32, 34, 36, 43, 45, 53-54, and 60-62 have been amended to properly refer to antecedent bases in independent claims 1, 12, 26, 30, 43, and 60. Claims 4, 6, 8, 13, 15-17, 20, 23-25, 27, 29, 33, 35, 37, 44, 46-48, 51-52, 55-59, and 63-65 have been canceled without prejudice.

After entry of the amendments, claims 1-3, 5, 7, 9-12, 14, 18-19, 21-22, 26, 28, 30-32, 34, 36, 38-43, 45, 49-50, 53-54, and 60-62 remain pending in the present application. The rejections under 35 U.S.C. §§ 102(a), 102(b), 102(e), and 103(a) are respectfully traversed.

Objections to the Drawings

The drawings were objected to under 37 C.F.R. § 1.84(p)(5) because reference numerals "1102" (FIG. 12B) and "1104" (FIG. 12C) were not mentioned in the specification and because the drawings do not include reference numeral "802" mentioned on page 25, line 31 of the specification. In response, applicants amended the specification so that reference numerals "1102" and "1104", which appear in FIGS. 12B and 12C, respectively, are now mentioned by the specification. In addition, applicant has amended the specification so that the reference to reference numeral "802" has been deleted on page 25, line 31. Applicants submit that the drawings are in compliance with 37 CFR 1.84(p)(5). Accordingly, withdrawal of the objection to the drawings under 37 CFR 1.84(p)(5) is requested.

Reply to Rejections under §102(a,b,e) and §103(a)

Independent claims 1, 12, 26, 30, 43, and 60, as amended, are directed to providing multiple cells on a display of an interactive television application wherein at least one cell is associated with a television channel entity and at least another cell is associated with another entity. The at least one cell that is associated with a television channel entity is associated with a first region on the display, and the at least another cell that is associated with the another entity is associated with a second region on the display. A user is allowed to navigate between different regions (i.e.,

the first and second regions) without focusing on cells within the regions. Then, when a user navigates to a region in which there is a cell that the user desires to be in focus, the interactive television application allows the user to cease the navigation of regions and begin navigating through the individual cells within a single region (see applicants' specification, page 27, lines 22-28).

Independent claims 12, 26, 43, and 60 are additionally directed to displaying at least one brand mark in the multiple cells on a display where the brand mark displayed in a particular cell is related to the entity with which the particular cell is associated. In independent claims 12 and 43, when a user navigates to a particular cell having a brand mark displayed therein, content other than the brand mark is displayed in the particular cell. In independent claims 26 and 60, an action is performed in response to a user selecting a cell to which the user has navigated.

The Office Action contends that Bereiter anticipates independent claims 1 and 30 (see Office Action, page 5). Applicants respectfully disagree. Applicants submit that Bereiter does not show or suggest an interactive television application and at least one cell associated with a television channel entity, as required by amended independent claims 1 and 30. Rather, Bereiter discloses a computer system in which a plurality of icons are displayed on a graphical user interface (GUI). When a user selects an icon associated with

a file system for a storage device, the GUI displays a system of "+" and "-" glyphs and nodes / sub-nodes that graphically display the file system for the storage device (see Bereiter, FIGS. 5, 6D; col. 8, line 1 - col. 9, line 48). However, Bereiter's computer system does not show or suggest applicants' interactive television application because the computer system does not relate to a television. Moreover, applicants submit that Bereiter does not show or suggest that the icons, glyphs, and nodes are associated with a television channel entity, as required by independent claims 1 and 30. The icons in Bereiter relate to programs and operations in a computer, and the "+" and "-" glyphs and nodes in Bereiter relate to a file system for a storage device. All of these do not show or suggest a television channel entity. Accordingly, since the computer system of Bereiter is not an interactive television application, and Bereiter does not teach at least one cell associated with a television channel entity, as required by independent claims 1 and 30, applicants submit that independent claims 1 and 30 are not shown or suggested by Bereiter.

The Office Action contends that Alexander anticipates independent claims 1 and 30 (see Office Action, page 6). Applicants respectfully disagree. Alexander, in FIG. 1, discloses an electronic program guide that includes, among other things, an advertising window, a picture-in-picture window, a grid guide, and an information box (see

Alexander, col. 3, lines 1-20). Although applicants' independent claims 1 and 30 may implicate the subject matter of Alexander, independent claims 1 and 30 patentably improve upon Alexander by requiring the features of grouping multiple cells on a display into regions based on the cell's associated entities, including a first region and a second region, and allowing the user to navigate between the first region and the second region without focusing on cells within the first region and the second region. Therefore, applicants submit that independent claims 1 and 30 are not shown or suggested by Alexander.

The Office Action contends that Matthews anticipates independent claims 1, 12, 26, 30, 43, and 60 (see Office Action, pages 6-7). Applicants respectfully disagree. Applicants submit that Matthews does not show or suggest grouping multiple cells on a display into regions, including a first region and a second region, and allowing the user to navigate between the first region and the second region without focusing on cells within the first region and the second region, as required by applicants' independent claims. Rather, Matthews discloses a video program guide that displays multiple tiles corresponding to programming available on selected channels. A viewer navigates the video program guide by focusing a cursor upon a tile and moving a cursor from one tile to another (see Matthews, FIGS. 4 and 6; col.4, line 44 - col. 5, line 22). However, Matthews does not show or suggest

grouping the tiles on the display into regions based on the cells' associated entities, as required by applicants' independent claims. Furthermore, Matthews teaches navigating the video program guide by focusing a cursor upon a tile and moving the cursor from one tile to another tile (see Matthews, col. 5, lines 12-22). Based on this teaching in Matthews, and based on applicants' submission that Matthews does not show or suggest grouping cells on a display into regions based on the cells' associated entities, Matthews cannot show applicants' feature of allowing the user to navigate between regions on the display without focusing on cells within the regions. Accordingly, since Matthews does not provide any teaching of grouping multiple cells on a display into regions, including a first region and a second region, and allowing the user to navigate between the first region and the second region without focusing on cells within the first region and the second region, applicants submit that independent claims 1, 12, 26, 30, 43, and 60 are not anticipated by Matthews.

Accordingly, applicants submit that independent claims 1, 12, 26, 30, 43, and 60 are allowable. Claims 2-3, 5, 7, 9-11, 14, and 21 are dependent from independent claim 1 and are allowable at least because claim 1 is allowable. Claims 18, 19, 22, and 27 are dependent from independent claim 12 and are allowable at least because claim 12 is allowable. Claim 28 is dependent from independent claim 26 and is allowable at least because claim 26 is allowable. Claims 31-

32, 34, 36, 38-42, 45, and 53 are dependent from independent claim 30 and are allowable at least because claim 30 is allowable. Claims 49, 50, 54, and 61 are dependent from independent claim 43 and are allowable at least because claim 43 is allowable. Claim 62 is dependent from independent claim 60 and is allowable at least because claim 60 is allowable.

Conclusion

In view of the foregoing, applicants respectfully submit that this application is in condition for allowance. Reconsideration and allowance of this application are respectfully requested.

Respectfully submitted,



Adam M. Saltzman
Reg. No. 52,188
Agent for Applicants
Fish & Neave IP Group
Ropes & Gray LLP
Customer No. 1473
1251 Avenue of the Americas
New York, New York 10020-1105
Tel.: (212) 596-9000
Fax: (212) 596-9090